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## **VIA ECF Filing**

Hon. Taryn A. Merkl, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Fair Housing Justice Center, Inc. et al. v. Juda Niayzov et al.**  
**Civil Case No.: 1:24-cv-04201**

Dear Judge Merkl:

As you may know, this firm represents 202 Marine LLC in the above-referenced matter. We write in response to Plaintiff's letter motion requesting a "discovery conference" for a "motion to compel." See ECF Dkt. No. 67.

We have informed Plaintiffs by writing several times that we would take further steps to address any deficiencies with the production of documents for 202 Marine LLC. We advised that we will locate any further documents if there are any in good faith." We have been continuously communicating with the Plaintiff's counsel to attempt to resolve any and all discovery issues. However, that does not mean that we will accept any unreasonable and/or unwarranted demands to create liability for our client, where one does not exist.

For this reason, as we informed Plaintiffs' counsel, we could not take part in a joint letter which made the erroneous representation that the parties have made "a good faith effort to resolve disputes before making any discovery motion," as required by this Court's Individual Practices. It is still unclear what relief Plaintiff seeks that the parties have not already agreed to address.

Respectfully submitted,  
Sekas Law Group, LLC

/s/Nicholas G. Sekas

Nicholas G. Sekas, Esq.